— CITY OF PORTLAND —
ENVIRONMENTAL SERVICES
1120 SW Fifth Avenue, Room 1000, Portland, Oregon 97204-1912 ▪ Sam Adams, Commissioner ▪ Dean Marriott, Director

August 3, 2007

Mr. Dana Bayuk
Department of Environmental Quality
2020 SW 4th Avenue, Suite 400
Portland, OR 97201-4987

Subject: City Comments on *Source Control Data Gaps Work Plan*, NW Natural Gasco Site, July 2007

Dear Dana:

This letter provides City of Portland comments to DEQ on the NW Natural Gasco Site *Source Control Data Gaps Work Plan*. Our comments are focused on the stormwater pathway to Doane Creek because this site's stormwater eventually discharges through City Outfall 22C. PAHs, phthalates, cyanide, carbazole and dibenzofuran have been detected in inline solids immediately downgradient of the Koppers facility. These results, documented in *City Outfall Basin 22C Inline Solids Sampling in the Vicinity of Koppers Industries, Inc.* (TM #22C-2, March 23, 2007), represent solids that accumulated since 2004 and therefore indicate the presence of a current source. High concentrations were found in the culvert where the Koppers site discharges via a pipe and in the 15-inch pipe that drains NW Front Avenue. It is unknown how site runoff might migrate to Outfall 22C via the NW Front Avenue catch basins. These data gaps must be addressed as part of an investigation into offsite migration of contaminants to Outfall 22C.

The City appreciates the efforts by DEQ and NW Natural to develop a stormwater sampling program that facilitates a stormwater pathway evaluation consistent with the DEQ/EPA Portland Harbor Joint Source Control Strategy (JSCS). In support of this objective, the City offers the following comments:

1. The work plan states in a number of places that catch basin analyses will be used to determine if stormwater sampling is needed and to pare down the analyte list. Catch basin data should not be used to limit further analysis, particularly given the high concentrations of contaminants in stormwater solids adjacent to the site. Pursuant to the JSCS, catch basin results are just one piece of the information that needs to be used to determine the stormwater sampling analyte list; other information, such as offsite concentrations (in-river or, in this case, Doane Creek) or site contaminants must also be considered to determine sampling parameters. Frequently detected Portland Harbor contaminants of interest (COIs), including metals, phthalates, PAHs, PCBs, and TPH, should also be included in the site stormwater pathway evaluation.
2. The work plan must describe the various activities and conveyances associated with each drainage area to explain the rationale for proposed sample locations. Clear descriptions of operations and contributions to each basin and the flow path for stormwater are needed to ensure that sampling is representative. For example, there are 11 catch basins and 4 sumps

within Basin A (the Koppers Basin) but there is no explanation of how the one sump selected for sampling could be representative.

3. The work plan should evaluate the site's potential for offsite migration to the adjacent City storm lines. Surface water runoff from areas with soil contamination, such as areas previously filled with spent oxide stockpiles on site and active rail spur loading areas, could include contaminants. Currently, the work plan proposes to sample a sump located approximately 600 feet away from Doane Creek. There are two catch basins close to the Doane culvert that should be sampled, along with sediment samples from Doane Creek at the outfall from Basin A. Samples from both are necessary to better characterize site solids and the runoff that might occur via sheet flow without any treatment.
4. In Section 2.4, the work plan states that if sufficient mass is not available to complete all analyses, the analyses will be conducted in the priority as shown by the order in Table 1. The first priority listed is grain size analysis, which takes a large amount of sample volume (500 grams). If there is limited sample volume, then the chemical analyses should be prioritized over grain size. The second analysis listed in Table 1 is metals which, while they may be of concern at the site, are not likely the primary COIs. We suggest that DEQ work with the site to insure that the highest priority COIs are analyzed as the highest priority.
5. The screening levels shown in Table 1 do not incorporate DEQ's recent updates to Table 3-1 of the JSCS. We suggest DEQ ask that the site reevaluate the proposed quantification limits to assure results will be useful to DEQ's review of the final data set.
6. Comments on Figures 2 and 3:
    - Figures 2 and 3 should include the drainage basin outlines shown on Figure 1 to clarify which operations are represented by samples collected from each basin. If the blue outlines are meant to depict the basins, they are shaped differently from the basin outlines shown in Figure 1.
    - There are several catch basins southwest of the Koppers office that do not appear to connect to the overall site drainage system. This should be clarified in the text and figures or additional data should be collected to trace the connections of these catch basins. If these catch basins do not drain to the sump, they should be considered for sampling if the operational activities conducted in their respective catchment areas are not represented by other sampling locations.
7. The work plan should describe the schedule for catch basin and stormwater sampling to ensure that the stormwater screening evaluation is completed this water year.

Thank you for your consideration of these comments. Please feel free to contact me at (503) 823-7263 if you have any questions regarding this letter.

Sincerely,

Linda Hall for DS

Dawn Sanders
Program Manager
Superfund Program

cc: Tom Roick/DEQ
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